

McLouth Steel Superfund Site Community Advisory Group (CAG)

TECHNICAL MEETING SUMMARY

February 10, 2022 | Virtual Meeting No. 6

MEETING IN BRIEF

The February 10, 2022 meeting of the McLouth Steel Superfund CAG took place online in a Zoom webinar. The objectives of the meeting included:

- Review the MSC Final Report on removal work under the Settlement Agreement
- Receive updates on cleanup on the northern portion
- Review the timeline for the remedial investigation
- Discuss other internal matters

Please see **Appendix A** for a list of CAG members, alternates, and agency representatives who were present. The recordings for this and previous CAG meetings have been posted on YouTube here: <https://youtu.be/UbiHNZCRy20>.

ACTION ITEMS

Responsibility	Item
CAG Members	<ul style="list-style-type: none">• Provide feedback to improve the accuracy of the Draft February Meeting Summary• Disseminate Final February Meeting Summary to community members• Ryan Stewart – provide <i>McLouth Plant Manual</i> document to Brian Kelly to pass along to Greg Gehrig
EPA/EGLE	<ul style="list-style-type: none">• Share updates on remedial investigations on the NPL site and RTRR portion at future meetings
MDHHS	<ul style="list-style-type: none">• Prepare to give an update on the Human Health Risk Assessment at the May 12 CAG meeting
CBI	<ul style="list-style-type: none">• Produce and distribute the Draft February Meeting Summary, integrate CAG feedback to refine, and send final for CAG dissemination and EPA posting• Coordinate with Leadership Board on agenda for May meeting and internal CAG business

DECISIONS REACHED & PROPOSED TOPICS FOR FUTURE DISCUSSION

Decisions Reached

- CAG and public questions or concern about cleanup or investigation activities at the McLouth site should be sent to EPA, EGLE, and/or Stacie Smith, CAG facilitator (stacie@cbi.org), and information or responses will be sent to the CAG to disseminate to the public.
- EPA shared an updated [Frequently Asked Questions](#) document, which includes a revised cleanup timeline.

- The next meeting will be held on May 12, 2022.

Proposed Topics for Future Discussion

- Further updates on remedial investigation
- Updates from MDHHS on the Human Health Risk Assessment
- Updates on the Monguagon Creek Upper Trenton Channel Site Lakes Legacy Act Project
 - Management of boundaries with the NPL site
- Shoreline stabilization and maintenance projects
- Review of draft CAG website

SUMMARY OF DISCUSSIONS

Consensus Building Institute (CBI) facilitator, Stacie Smith, welcomed participants, explained the features of using the Zoom Webinar interface for all participants, and reviewed the meeting agenda and ground rules. Slides used by the presenters can be found on the EPA McLouth Superfund website here: www.epa.gov/superfund/mclouth-steel.

Review of MSC Final Report

Brian Kelly, EPA Region 5 On-Scene Coordinator, introduced himself and indicated that his colleague Greg Gehrig will be overseeing the site for EPA as remedial project manager. Mr. Kelly then shared a presentation, beginning with an overview of the background to the site and adjacent parcels. The southern portion is a National Priorities List (NPL) site and comprises a larger parcel owned by MSC Land Company LLC under the settlement agreement and two smaller parcels owned by Detroit Steel Company (DSC). The northern portion is under an EGLE Corrective Action Consent Order (CACO) and is owned by the Riverview Trenton Railroad Company (RTRR). In the past, the site has been subject to EPA removal activities, including Black Lagoon, a PCB cleanup, and leachate response.

In 2013, Friends of the Detroit River (FDR) filed a citizens' petition for the Southern Portion and the Gibraltar sites to be added to the NPL. Jim Wagner (as the former Trenton City Manager) was instrumental in securing resolutions from the municipalities of Trenton, Riverview, and Grosse Ile in support of NPL listing.

As a result of foreclosure, the county entered into a Purchase and Development Agreement in 2017, without which the site would have gone to auction for as low as \$500. In 2018, EPA, the US Department of Justice, and EGLE entered into an Administrative Settlement Agreement and Covenant Not to Sue with Crown Enterprises and MSC Land Company to clarify environmental liability. Under the Settlement Agreement, Crown and MSC were required to

- Demolish 45 structures
- Remove asbestos, wastes, and PCBs prior to demolition
- Erect a fence around the property
- Remove contaminated water and sludges from 23 pits, basements, and lagoons
- Investigate 5 areas for PCBs

- Assess and report on options for stormwater management

MSC also carried out additional work not required under the Settlement Agreement under the same workplans.

The table below summarizes types and quantities of waste removed under the Settlement Agreement (2019-2021):

Type of Waste	Quantity
Friable ACM:	2,690 yards (73 Truck Loads)
Fire Brick with asbestos:	6,082 tons (149 Truck Loads)
Galbestos Siding:	3,519 tons
Const. & Demo Debris:	21,451 tons
PCB Transformers:	528 tons (97 Transformers)
Liquid Waste:	2,835,643 gallons
TSCA Solid Waste:	942 tons
Freon/Refrigerant Units:	70 units drained, recycled
K061 Liquid Hazardous Waste	32,956 gallons
K061 Solid Hazardous Waste:	8 ROBs
K062 Liquid Hazardous Waste:	101,539 gallons
K062 Solid Hazardous Waste:	50 cubic yards
Non-Hazardous Solids:	2,934 yards

EPA and EGLE had an oversight role under the Settlement Agreement, with responsibilities as follows:

- Approving workplans, contractors, disposal facilities, the project manager and the air technician
- Conducting site visits
- (EPA) Hiring a contractor and maintaining a dedicated workspace
- Reviewing MSC monthly reports and issuing and reviewing EPA situation reports
- Conducting a final walkthrough inspection of the site
- (EPA) Issuing a notice of completion
- Reviewing the final report and related appendices

Mr. Kelly noted that EPA reviewed roughly 200 settlement requirements over the course of the removal work.

The Settlement Agreement required Crown Enterprises and MSC to submit a final report within 45 days of completion, which –

- Summarizes the cleanup

- Lists wastes and their destinations and manifests
- Details analytical results
- Includes a certification signed by a responsible corporate official under penalty of law that the report is true, accurate, and complete

EPA and EGLE reviewed the report and returned comments requesting –

- Corrections to formatting, acronyms, and the background
- A text listing of disposal facilities
- A list of contaminants of concern (COCs)
- A cross-referenced table of units

EPA also made the report available for public comment.

Mr. Kelly ended by expressing thanks to Bob Burns and FDR, Jim Wagner, Rep. Debbie Dingell, the municipalities of Trenton, Riverview, and Grosse Ile, and the CAG Leadership Board and members, for their attention, engagement, and support in moving this forward.

He then invited Michael Samhat, President of Crown Enterprises, to give remarks. Mr. Samhat expressed thanks to all involved and paid tribute to the late mayor of Trenton, Kyle Stack, for her commitment to the effort.

Jacob Runge, EGLE engineer and project manager for the RTRR parcel, then gave an overview of progress on the northern portion of the site. Unlike the NPL site, which is bound by the Settlement Agreement, environmental liability for the northern portion falls on the property owner – RTRR. Mr. Runge is currently preparing an Enforcement Referral which comprises a packet of materials which will be handed over to EGLE’s enforcement division. They will then write legally enforceable language which will commence a cleanup.

EPA and EGLE entered into a memorandum of understanding (MOU) which details that EGLE intends to treat the cleanup of northern portion at or near to Superfund levels. This MOU would enable the site to be treated as one continuous parcel from a practical standpoint. Courtney Fung, EGLE Superfund Project Manager, will take over as project manager for the northern portion.

Mr. Runge also informed that he contacted Wayne County Drain Commission to inquire about the paving of West Jefferson Avenue, given frequent complaints about pooling on the avenue in the vicinity of the northern portion [an independent issue from EGLE’s work on the site]. He relayed that they plan to repave the avenue in the summer and address the drains at that time.

CAG members offered the following comments and questions (*answers in italics*). [Note: some of these questions or comments were made during later parts of the agenda – they are documented here to promote clarity. Some answers have been expanded in order to ensure that all the member’s questions have been addressed.]

- **There are some missing dates in the work logs (10/11/2019-11/8/2019) in the final report, during which the 2nd violation occurred. Have you made progress in acquiring those work logs and when will they be made available?**
 - *EPA: We do not currently have those logs, and we included that in our comments to ASTI (technical consultant on the Final Report).*
- **Have the foundations of former structures been mapped to provide a record for future cleanup and redevelopment?**
 - *EPA: No, that was not a requirement under the Settlement Agreement.*
- **Would mapping of former structures be part of the remedial investigation?**
 - *EPA: It would depend on the needs of the cleanup. We would not be doing that work for redevelopment.*
- **What is the status of the 2 brick buildings on the southeast corner of the NPL site?**
 - *EPA: Those are former pump house buildings. The Settlement Agreement did not identify them as structures to be demolished, but the interiors have been cleaned out. I understand that MSC has chosen to keep those buildings.*
- **Will the cooling towers located on the DSC parcels be removed in the near future?**
 - *EPA: No, those towers will be addressed during the Superfund remedial action.*
- **What was the purpose of the “mercury labor building”?**
 - *EPA: That was a small building south of the main superstructure and is the same parcel that EPA undertook a cleanup of in 2017. Mercury was spilled as a result of a break-in by vandals. When MSC commenced demolition, they found additional mercury. MSC’s environmental contractor carried out further action.*
- **How much money was spent on the cleanup?**
 - *EPA: The county required quarterly reports, which are included in the Final Report. The total was roughly \$31-32 million and 100,000 labor hours. It was phenomenal that there were no OSHA reportable injuries.*
 - **Was any city, county, state, or federal funding spent?**
 - *EPA: All of the funds spent came from MSC, though this was not something that EPA tracked directly.*
- **Thank you for the work done already, but it seems that this is only the beginning. I hope the CAG will stay involved to make sure that the land itself can be prepared for future development.**
- **In my experience as a former employee at McLouth Steel, there are many places that contain contaminants. A significant issue is water quality and treatment, particularly stagnant water and water in the sluiceways. There are miles of pipes that need to be cleaned, particularly since there has been no running water on the property.**
 - *EPA: Part of clearing basements and pits involved clearing out lines, but not everything was reached. There is much more work to be done.*

Update on Investigation and Remediation Timeline

Greg Gehrig, EPA Region 5 Remedial Project Manager, and Diane Russell, EPA Region 5 Community Involvement Coordinator, provided an overview of the revised timeline (available on page 3 of EPA's [FAQs](#) for the site). Mr. Gehrig shared that EPA is still in the procurement process for a contractor to begin the remedial investigation. He hopes to have a contractor in place by September, the end of (federal) fiscal year 2022. Fieldwork would begin after spring 2023. He reminded the group that the process for the remedial investigation, feasibility study, remedial decision, and execution of the remedy will be long. He also shared that EPA is committed to working with Crown Enterprises on redevelopment and believe that, with sufficient coordination, redevelopment can take place safely alongside the Superfund process. Sediment downstream of the property will also be part of the investigation and remediation.

He also shared that the scoping process is ongoing and will continue until the remedial investigation is completed. He is currently reviewing EGLE's historical files and documentation in order to determine where contaminants may be located.

CAG WORK PLANNING, MEMBER UPDATES, & PUBLIC COMMENT

Public Comment

Members of the public were invited to ask questions using the Q&A feature in Zoom Webinar. Those questions are summarized below, along with oral comments and questions.

- **How will soils be investigated on the site?**
 - *EPA: We will look to identify and characterize all the waste on the site horizontally and vertically (including underground). We will also be looking at subsurface structures and conveyance systems. We will come up with a plan to address that contamination in coordination with EGLE.*
- **Are there sewers near the 2 brick buildings on the southeast corner of the NPL site? I believe they were a water treatment plant. Has anyone tested the sediments near the buildings?**
 - *EPA: The Settlement Agreement did not require MSC to test sediments. EGLE did some testing as part of their extended site investigation, though not to characterize the sediments. These preliminary investigations showed that the sewer systems were broken and do not convey any material to the river. EPA's remedial investigation will test and characterize sediments.*
- **Will Superfund signage remain posted on the property boundaries until EPA fully remediates and delists the property? Is there Superfund signage on the waterfront boundary?**
 - *EPA: Yes, the signs will remain up. There are currently no signs on the water boundary. Signage would be discussed as part of redevelopment activities, though they will remain as long as the property is not being developed.*

WRAP UP & NEXT STEPS

Ms. Smith thanked the CAG, presenters, and members of the public for their participation, questions, and comments. She reminded the CAG that the next meeting will take place on May 12 and noted that the DRAFT meeting summary would be sent out soon.

The meeting was adjourned.

Appendix A. CAG Stakeholder Representatives in Attendance

Primary and Alternate CAG representatives present at the **February 10, 2022** meeting are listed below.

Affiliation	Representative
City of Trenton	Jim Wagner Wendy Pate
City of Riverview	Chuck Norton
Grosse Ile Township	
Riverview Brownfields Authority	Brian Webb
City of Trenton Brownfields	Robert Howey
Trenton Visionaries	Wendy Pate
Grosse Ile Nature and Land Conservancy	Doug Thiel
Grosse Ile Civic Association	
Friends of the Detroit River	Robert Burns Mary Bohling, alt.
DownRiver Waterfront Conservancy	
Past Employees of McLouth Steel	
Abutters	Robert Johnson
At-large Community Representatives	Emily Hornbeck Larry Ladomer Judith Maiga Ryan Stewart Edie Traster
Liaison for Rep Debbie Dingell's Office (Trenton)	Bryan McMurrin
Downriver Community Conference	John D'Addona

Agencies represented

Dr. Puneet Vij, MDHHS
Brian Kelly, US EPA Region 5
Greg Gehrig, US EPA Region 5
Diane Russell, US EPA Region 5
Kirstin Safakas, US EPA Region 5
Jacob Runge, EGLE
Courtney Fung, EGLE